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**From:** Schaufelberger, Daniel [schaufelberger.daniel@epa.gov]  
**Sent:** 12/3/2018 6:24:51 PM  
**To:** Ayres, Sara [Ayres.Sara@epa.gov]  
**Subject:** FW: Glen-Gery construction permit application status -Correction

Sara – Another update regarding Glen-Gery (See below). Seems they were issued a revised draft permit on November 19<sup>th</sup> and are still reviewing.

Daniel Schaufelberger  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Blvd. (AE-17J)  
Chicago, IL 60604-3590  
Phone: (312) 886-6814

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**From:** Marcus, Danny  
**Sent:** Monday, December 03, 2018 12:13 PM  
**To:** Schaufelberger, Daniel <schaufelberger.daniel@epa.gov>  
**Cc:** Ogulei, David <Ogulei.David@epa.gov>  
**Subject:** FW: Glen-Gery construction permit application status -Correction

IEPA sent Glen-Gery a revised draft of the permit just weeks ago.

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**From:** Romaine, Chris <Chris.Romaine@Illinois.gov>  
**Sent:** Monday, December 3, 2018 12:03 PM  
**To:** Marcus, Danny <marcus.danny@epa.gov>  
**Cc:** Ogulei, David <Ogulei.David@epa.gov>; Schnepf, Jason <Jason.Schnepf@Illinois.gov>; Bernoteit, Bob <Bob.Bernoteit@Illinois.gov>; Marr, Bill <Bill.Marr@Illinois.gov>; Patel, Minesh <Minesh.Patel@Illinois.gov>; Lowrey, Norm <Norm.Lowrey@Illinois.gov>  
**Subject:** RE: Glen-Gery construction permit application status -Correction

Minesh Patel is actually working on the application from Glen-Gery that would make this source into a non-major source for emissions of HAPs. For this purpose, Glen-Gery has applied for revisions to an issued construction permit.

The scrubbers on the two brick kilns at Glen-Gery that control emissions of acid gases were actually installed over ten years ago. As appropriate then, at a time when the once-in, always-in policy was in effect, the construction permit for the scrubbers was based on these scrubbers being required control devices for compliance with the original Brick NESHAP.

The revisions requested by Glen-Gery would recognize that the source is not a major source of HAPs with enforceable requirements for HAP emissions based on the routine use of these scrubbers. For this purpose, Glen Gery has actually applied for revisions to the construction permit that addressed the addition of a second brick kiln to the source, not the subsequent construction permit for the addition of scrubbers on the kilns. The construction permit for addition of the second kiln to the source also includes restrictions related to HAP emissions that now need to be reworked or undone.

Glen-Gery is currently reviewing a draft of this revised construction permit, which the Agency sent out on November 19<sup>th</sup>. The revised draft of the permit that the Agency prepared includes an explicit allowance for uncontrolled emissions from operation without the scrubber for a short period each year. This would provide for some continued operation of the kilns during maintenance on or upset of the scrubbers(s). While Glen-Gery's application recognized the need to provide for maintenance of the scrubbers, Glen-Gery did not propose numerical limits for operation and emissions of this uncontrolled mode of operation.

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**From:** Schnepf, Jason  
**Sent:** Monday, December 03, 2018 11:28 AM  
**To:** Marcus, Danny <[marcus.danny@epa.gov](mailto:marcus.danny@epa.gov)>; Marr, Bill <[Bill.Marr@illinois.gov](mailto:Bill.Marr@illinois.gov)>; Bernoteit, Bob <[Bob.Bernoteit@illinois.gov](mailto:Bob.Bernoteit@illinois.gov)>  
**Cc:** Ogulei, David <[Ogulei.David@epa.gov](mailto:Ogulei.David@epa.gov)>; Romaine, Chris <[Chris.Romaine@illinois.gov](mailto:Chris.Romaine@illinois.gov)>  
**Subject:** RE: Richards Brick and Glen-Gery construction permit application status

I believe these are both FESOP sources, so Bob would handle these.

Thanks,  
Jason

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**From:** Marcus, Danny <[marcus.danny@epa.gov](mailto:marcus.danny@epa.gov)>  
**Sent:** Monday, December 03, 2018 11:12 AM  
**To:** Schnepf, Jason <[Jason.Schnepf@illinois.gov](mailto:Jason.Schnepf@illinois.gov)>; Marr, Bill <[Bill.Marr@illinois.gov](mailto:Bill.Marr@illinois.gov)>; Bernoteit, Bob <[Bob.Bernoteit@illinois.gov](mailto:Bob.Bernoteit@illinois.gov)>  
**Cc:** Ogulei, David <[Ogulei.David@epa.gov](mailto:Ogulei.David@epa.gov)>  
**Subject:** [External] Richards Brick and Glen-Gery construction permit application status

Jason/Bill/Bob,

Would any of you happen to have an update on the following sources' applications (we understand that they got controls installed to put them below the major source threshold and get permits limiting them to area source levels of HAP):

- Richards Brick
- Glen-Gery

If there is someone else that I can reach out to, would you let me know who or forward on and copy me?

Thanks!  
Danny.

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